

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

EDWARD CONSTANTINESCU,
PERRY "PJ" MATLOCK,
JOHN RYBARCZYK,
GARY DEEL,
STEFAN HRVATIN,
TOM COOPERMAN,
MITCHELL HENNESSEY,
DANIEL KNIGHT.

No. 4:22-CR-00612-S

DEFENDANT'S MOTION FOR RETURN OF CASH BOND

TO THE HONORABLE ANDREW HANEN, UNITED STATES DISTRICT JUDGE:

COMES NOW EDWARD CONSTANTINESCU and submits this Motion for the return of the cash bond paid in the amount of \$200,000.00 (receipt number # HOU112985). This case was subsequently dismissed without prejudice on March 20, 2024. This Court ordered the return of the Defendant's cash bond directly to the Defendant on April 16, 2024. On May 14, 2024, the Clerk's Office for the Southern District of Texas issued a check for the amount owed, however, it was not received and never cashed; the Treasury canceled the check. Counsel now files this subsequent motion seeking the Court to vacate its April 14, 2024, order, and issue a new order that the Clerk's office to return the funds directly to Ford O'Brien Landy, LLP. An application for assignment of these funds is submitted with this motion.

Respectfully submitted,

/s/Matthew A. Ford

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*Attorneys for Defendant
Edward Constantinescu*

CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2024, a true and correct copy of the foregoing document has been electronically served on all counsel of record via the Court's CM/ECF system.

/s/Matthew A. Ford
Matthew A. Ford

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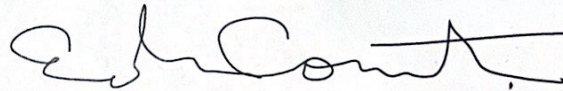
APPLICATION FOR ASSIGNMENT OF BAIL FUNDS

I, Edward Constantinescu, am the Cash Bond Depositor in the above styled case. I hereby assign, transfer, and authorize my case bond refund in the amount of \$200,000 plus accrued interest to be made payable to FORD O'BRIEN LANDY, LLP, whose mailing address is 275 Madison Avenue, Floor 24, New York, New York 10016, upon final disposition of the above styled case.

The undersigned Cash Bond Depositor understands that once this document is signed, all rights, claims, and interest of ownership are immediately transferred to FORD O'BRIEN LANDY, LLP.

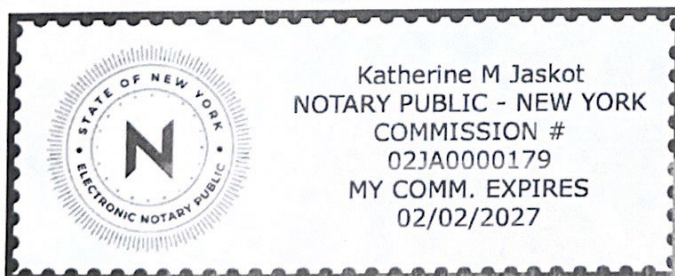
July 17, 2024

DATE



Cash Bond Depositor

The foregoing instrument was acknowledged before me this day 17 of JULY, 2024, by Edward Constantinescu, who personally appeared before me.



NOTARY PUBLIC STATE OF
NEW YORK